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ENVIRONMENTAL INC.

WA 2917

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RCRA PERMITS SECTION

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CERTIFIED MAIL

October 31, 1991

Ms. Cindy Gilder
Section Head
Hazardous Waste Permits Section
Washington Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711

Re: Comments on the Pier 91 Facility September 30, 1991
preliminary draft RCRA Part B Permit

Dear Ms. Gilder:

Enclosed is a copy of comments from Chemical Processors, Inc., dba Burlington Environmental Inc., on the preliminary draft of the Pier 91 Facility Part B Permit, dated September 30, 1991.

Our comments on this draft are similar in nature to the comments we submitted previously on the Georgetown and Washougal Facility Part B Permits in that they are aimed largely at clarifying Permit conditions and ensuring that practical operational concerns are addressed. For the most part these comments address new issues raised in this draft permit application, since we recognize that progress has been made in resolving issues raised in comments on permit applications for our other facilities.

Thank you for the opportunity to comment on this draft of the Pier 91 Facility Part B Permit. I am available to meet with you if you have any questions after reviewing these comments. I can be reached at 223-0500.

Sincerely,

Catherine L. Buller

Catherine L. Buller
Environmental Program Manager

cc: Carrie Sikorski, EPA

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USEPA RCRA



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**BURLINGTON
ENVIRONMENTAL INC.**
CHEMPRO Division

COMMENTS FROM BURLINGTON ENVIRONMENTAL, INC./
CHEMPRO DIVISION ON SEPTEMBER 30, 1991
PRELIMINARY FIRST DRAFT PART B PERMIT FOR PIER 91 FACILITY

Comments submitted to Ecology October 31, 1991

General Comments:

(1) It would be helpful, for both Ecology and the Permittee, if all appropriate regulatory references were included throughout the Permit.

(2) In all permit conditions please use the term "dangerous waste" instead of "waste". This change is needed to note the distinction of dangerous waste compared to other non RCRA-regulated waste. We have attempted to identify necessary corrections of this term throughout our comments.

PART I- STANDARD CONDITIONS

I.A. EFFECT OF PERMIT

Please refer to WAC 173-303-810(8) as an important reference for this permit condition.

I.C PERMIT ACTIONS

I.C.3. This permit condition should be revised to include reference to the Permit Modification System in WAC 173-303-830(3). Please also note the typo in the first sentence. The references should read " WAC 173-303-830 (3) and (4), and 40 CFR 270.42."

Discussions with Ecology Headquarters and Northwest region staff have clarified that a Permit Modification will not be necessary to address changes from design drawings to as-built drawings, as long as a record of the changes is kept at the facility for review by Ecology staff. Therefore, the last sentence of this permit condition should be deleted.

I.E. DUTIES AND REQUIREMENTS

I.E.1. This permit condition should be revised to include reference to permit by rule; therefore, the text should be modified as follows:

"The Permittee shall comply with all conditions of this Permit, except to the extent and for the duration such noncompliance is authorized by an emergency Permit or a Permit by rule. Any Permit noncompliance, other than noncompliance authorized by an emergency Permit or a Permit by rule, constitutes a violation of RCRA and is grounds for revocation and reissuance, or modification; or for denial of a Permit renewal application."

I.E.3. Please reference WAC 173-303-810(4) as the regulatory basis for this permit condition.

I.E.8. This permit condition is redundant and should be deleted. The subject of physical alterations or additions to the facility is adequately addressed in permit conditions II.C.2.a.i. and I.C.3.

PART II GENERAL FACILITY CONDITIONS

II.A. GENERAL WASTE MANAGEMENT

II.A.1. Please revise this permit condition to refer to "waste" in the first, second, and last sentences as "dangerous waste".

The phrase "conditionally exempt small quantity generators" is not consistent with regulatory language in the state's Dangerous Waste Regulations (WAC 173-303). Please revise this permit condition to delete the words "conditionally exempt" from the second sentence.

II.A.2. This permit condition should be changed to be consistent with the Georgetown Facility Permit condition II.A.2. It should read as follows:

"The Permittee must keep a copy of this written notice as part of the operating record ~~until-final-closure-of the-facility~~ for at least three years (this may be by reference to records at the corporate office)."

II.A.5. It is not necessary to reference an on-line tracking system for this facility since the manual system currently

in place is sufficient; therefore, the last sentence of this permit condition should be deleted.

II.A.6. More specific and appropriate permit language has been developed concerning waste stream characterization, as a result of meetings with Ecology regarding appealed permit conditions in the Georgetown Facility Part B Permit. Consistent with the latest draft language discussed with Ecology, please revise and reformat this permit condition to read as follows:

"Each regulated generator waste stream which is received by the Permittee more than twice a year shall undergo annual full characterization. Full characterization is defined as completing a waste profile sheet which shall identify ~~all~~ dangerous constituents and characteristics necessary for proper designation and management of the waste stream, along with accounting for 100% of the material (e.g., 30% oil, 70% water).

- a. ~~Annual~~ full characterization, except in the circumstances defined in b. and c. below, shall include or consist of:
 - i. ~~Review of~~ existing published or documented data on the dangerous waste or on waste generated from similar processes. The ~~review~~ use of existing published or documented data shall include confirmation by the generator that the process generating the dangerous waste has not significantly changed; or
 - ii. Laboratory analysis consisting of chemical, physical and/or biological analyses of the waste stream. Laboratory analysis shall be performed by a laboratory accredited by Washington State under Chapter 173-50, using analytical methods published in SW-846. Ecology may approve use of alternate comprehensive inorganic and organic screening techniques in place of SW-846 test methods, for the purposes of properly managing and designating dangerous waste streams. Wastes must shall be analyzed for all hazardous constituents except those which can demonstrated not to be present in any that generator's waste stream, or those which do not change the proper designation and management of the wastestream.

- b. In the following circumstances a wastestream shall undergo full characterization must-be-by consisting solely of laboratory analyses only meeting the requirements of II.A.6.a.ii above:
- i. The Permittee has been notified, or has reason to believe, that the process ofr operation generating the dangerous waste has significantly changed, and full characterization of the changed waste stream cannot be accomplished using existing published or documented data on the dangerous waste, or on waste generated from similar processes.
 - ii. ~~When~~ there is a discrepancy between a generator's waste designation, as provided by the generator profile or the manifest description, and the Permittee's waste designation, as determined by the screening analysis or any further waste analysis, and (1) the discrepancy cannot be resolved using steps outlined in Permit condition II.A.15., or (2) full characterization of the changed waste stream cannot be accomplished using existing published or documented data on the dangerous waste, or on waste generated from similar processes; and
 - iii. ~~The-first-time-a-waste-undergoes-full characterization; and~~
 - iv. No ~~less~~ more than five years from the last full characterization by laboratory analysis.

II.A.6.c. Please note, language in this permit condition is expected to be revised to include additional waste streams, after further discussion of an appealed permit condition in the Georgetown Facility Part B Permit.

II.A.6.c.i. Please correct the typo in this subsection, from "chamicals" to chemicals".

II.A.6.c.iii. Please revise this permit condition as follows:

"Unaltered Off-spec or outdated commercial products in the original product container(s); and"

II.A.7, 8, 11 and 17. General comment: These permit conditions all address management of dangerous wastes with possible Btu value. For clarity and ease, it would be helpful to regroup these permit conditions so they occur in consecutive order, in one location in the permit.

II.A.7. This condition is ambiguous and confusing. It is possible that the generator might bulk waste prior to our receipt of the waste. Also, the permit condition should be clarified to state that the waste involved is dangerous waste. Please revise the permit condition as follows:

"For all dangerous wastes which are subject to the 5,000 Btu/lb minimum requirement of Permit Condition II.A.17 and which are mixed by the Permittee with different wastestreams and/or wastes from different generators for the purpose of bulk transport to the facility, the Permittee shall obtain representative samples of the waste, as generated, prior to bulking by the Permittee. Such samples shall be subject to all appropriate analyses pursuant to Attachment CC and permit condition II.A.11. The Permittee is not responsible for sampling of waste prior to bulking of waste by the generator."

II.A.9. This permit condition should be qualified to include dangerous waste as follows:

"Each incoming shipment of dangerous waste shall be sampled....."

II.A.10. The first sentence of the permit condition should be revised as follows:

" Each incoming shipment of dangerous waste from...."

II.A.11. This permit condition should be revised to reflect changes agreed to during discussion of an identical permit condition in the Georgetown Facility Part B Permit.

Please note, revised wording for permit condition II.A.11.b. is still under discussion with Ecology as part of the Georgetown Part B Permit appeal process. At the present time we suggest the wording sent to Ecology in draft form October 3, 1991 as part of the Georgetown appeal discussion. We appreciate Ecology's efforts to develop satisfactory permit language for this topic, but feel that the basis for language suggested by Ecology in this subsection has not yet been established.

The permit condition should be revised as follows:

"For all materials subject to the 5,000 Btu/lb minimum requirement of Permit Condition II.A.17., the Btu value of all required samples including those of incoming bulk shipments, on-site generated wastes, and those collected pursuant to Permit Conditions II.A.7. and II.A.8., shall be determined. Except as specified below, the method used shall be Method D-2105 of the 1986 Annual Book of ASTM Standards. The permittee shall not be required to determine by laboratory analysis the Btu value of wastes under the following circumstances:

- a. The Permittee can demonstrate using existing published or documented data that the waste is an-unaltered-commercial product a material with a known heat content above 5,000 Btu/lb; or
- b. The-most-recent-waste-profile-of-the wastestream-indicates-a-value-of-greater than-7,500-Btu/lb,-plus-three-consecutive shipments-of-that-wastestream-subsequent-to the-most-recent-waste-profile-all-have values-above-7,500-Btu/lb- Substances received in a mixture, when one or more substance in the mixture has sufficient Btu value to result in values of 5,000 Btu/lb or above for the entire mixture. (e.g. A mixture's total Btu value is 8,000 Btu/lb when 80% of the mixture is a substance with 10,000 Btu/lb and 20% water with 0 Btu/lb.

II.A.15.b. This permit condition is not consistent with the requirements of WAC 173-303-370(4)(b). The current wording of the permit condition should be deleted and replaced with revised wording as follows:

"A significant manifest discrepancy shall be resolved within 15 days after receiving the waste. If a longer period is required the Permittee shall notify Ecology."

II.A.17. Pursuant to negotiations with Ecology on the Georgetown Facility Part B Permit, the permit condition should be revised to read as follows:

"The Permittee shall comply with the prohibition guidance on sham recycling of low Btu wastes, as stated in the March 16, 1983 Federal register (48FR 11157) and subsequent updates. Wastes with values below 5,000 Btu/lb as generated, both received from off-site and

generated on-site, shall not be incorporated into dangerous waste fuels, unless one of the conditions listed below is met.

a. Wastes are exempt from the requirements of this permit condition if:

ai. They are received from conditionally exempt small quantity generators;

bii. It can be demonstrated that the dangerous waste is burned solely as an ingredient; or

eiii. The final destination of the dangerous waste fuel is an industrial boiler or furnace that has achieved certification of compliance with final permit standards or interim emission standards under 40 CFR 266.102 or 266.103.

b. Phase separation of wastes constitutes treatment. The outputs of such treatment are, thus, wastes generated on-site and subject to the requirements of this permit condition.

II.A.18. This permit condition should be modified because new testing methods are constantly being developed. The wording should be as follows:

"All analyses performed in order to determine whether a waste, with unknown composition, exhibits the characteristic of ignitability shall be done with the most recent suggested methods in SW-846.-a-Pensky-Martens-Closed-Cup-Tester, using the test method specified in ASTM Standard D-93-79 or D-93-80, or a Setaflash-Closed-Cup-Tester, using the test method specified in ASTM Standard D-3278-78. Currently these methods are Method 1010: a Pensky-Martens Closed Cup Tester and Method 1020: a Setaflash Closed Cup Tester."

II.B. PREPAREDNESS AND PREVENTION

II.B.2. The permit condition should be revised to specify the material carried by trucks, as follows:

"A facility employee shall observe all on-site loading and unloading of tanker trucks containing dangerous wastes and occurring within the facility."

II.C. RECORD KEEPING AND REPORTING

II.C.2.a.vi Annual reports must be kept for a period of 5 years for the Generator Report, Form 4, and 3 years for the TSD Facility Report, Form 5. Please revise this permit condition to create two permit conditions, and place them into sections II.C.2.b. (records to be kept for 5 years) and revised section II.C.2.c (records to be kept for 3 years), respectively.

II.C.2.a.x. Please make this condition congruent to the Georgetown and Washougal Facility Permits by placing it in revised section II.C.2.c (records to be kept for 3 years).

II.C.2.a.xi. Please revise this permit condition to be more specific, as follows:

"Training records of current facility personnel."

II.C.2.a.xiii. Please revise this permit condition to indicate that these records may be kept at the corporate office, since many construction activities will be monitored by our corporate engineering department.

II.C.2.b. Please correct the typo in the last sentence of this permit condition: the word "kept" should be revised to "keep".

II.C.2.b.vi. There are two permit conditions with this designation. Please delete the first one, since permit condition IV.A.3.b. (referred to here) will also be deleted.

II.C.2.b.vi, vii, viii. Please revise section II.C.2.c to parallel permit conditions in the Georgetown and Washougal Facility permits, stating that these records must be kept for a minimum of 3 years. Then revise current permit conditions II.C.2.b.vi, vii, and viii to become revised permit conditions II.C.2.c.i, ii and iii.

II.C.2.b.vii: Please revise this permit condition to be more specific, as follows:

"Training records of former facility personnel."

II.C.2.c. Please revise this permit condition and all subsections as II.C.2.d, since a new section has been created for records to be kept for 3 years.

II.C.2.c.vii. Please revise this permit condition to refer to WAC 173-303-640(3)(h) and WAC-173-303-640(4)(h)(i)[sic](D), as well as the 40 CFR section currently cited.

II.C.2.c.viii and ix. Please delete these permit conditions, as they are redundant with permit condition II.C.2.c.vii.B.

II.C.2.c.x.F. Please revise this permit condition to indicate that these records may be kept at the corporate office, since corporate office personnel may assist with maintenance of the records.

II.C.3. This permit condition is redundant with permit conditions I.E.6., I.F.2. and II.C.2.x., and should be deleted. In addition, raw data which has not undergone QA/QC to assure its validity is useless to any party interested in reviewing the data. Also, there exists no regulatory requirement for providing this information.

II.D. CLOSURE

General Comment: Chempro has been told that Ecology's Hazardous Waste Permit group (with all new staff since 1989) is now re-evaluating closure guidance developed in 1989, but that a date for issuance of the revised guidance is at least six to nine months away. For this reason we feel it is still necessary to point out that we are not comfortable with Permit conditions which affect portions of the Closure Plan while the full extent of the changes in Ecology's guidance is still not known.

II.D.5. We are concerned that this Permit condition renders an approved background sampling plan meaningless. Methods used to determine under what conditions the sampling plan would be re-evaluated are not defined. Without defined parameters for rejecting an approved sampling plan after implementation, the process of developing an initial plan is pointless.

We understand that the need to conduct additional sampling and analysis may occur, however, this condition as written implies that additional sampling and analysis is expected,

and that the opportunity to determine this need is available only to Ecology. This Permit condition should be deleted.

II.D.6. Please note, revised wording for this permit condition is still under discussion with Ecology as part of the Georgetown Part B Permit appeal process. Our key concerns are reiterated below.

The requirement to analyze for all hazardous constituents in 40 CFR Part 261 Appendix VIII as well as all hazardous substances under WAC 173-340 is inappropriate and cannot be accomplished using current analytical technology.

There is also no regulatory basis for linking clean closure levels in WAC 173-303 to the Model Toxics Control Act cleanup levels in WAC 173-340. In addition, the Permit condition does not define which background standard will be used (i.e., WAC 173-303 or -340).

The Permit condition also does not specify if the "methods" used to determine whether soil samples demonstrate compliance with the standards for clean closure are analytical methods or statistical methods.

This Permit condition should be revised to allow appropriate clean closure levels to be established at the time of closure, based on existing regulations addressing the hazardous constituents that have been handled on site.

II.D.7. Analysis for all Appendix VIII constituents at the time of closure is inappropriate and cannot be accomplished using current analytical technology. Although the permit condition allows a demonstration that a shorter list of constituents may be appropriate, funding for the longer list of analyses must be demonstrated while the permit is in effect. These analyses may result in at least three times more funding being necessary for analyses which may not be required at the time of closure.

In addition, Appendix VIII is not an appropriate analytical list since it has been altered to no longer include common hazardous constituents. Please refer to Ecology's letter to Chempro (October 23, 1991) acknowledging that Appendix IX is a more useful list of constituents for analysis.

Lastly, there is no regulatory basis for linking the cleanup standards of WAC 173-303 to the list of hazardous substances in WAC 173-340 (Model Toxics Control Act).

Our current closure plan, Attachment HH, specifies a more reasonable approach to analyses for closure, including

limited testing of the widest possible and most frequently received range of hazardous constituents. The permit condition should be revised to reflect this approach. In the event that the permit is modified at a later time to include new wastes, there will be an opportunity at that time to re-evaluate the proposed analyses, and increase funding for closure if necessary.

II.D.8. Appendix HH describes in detail a comprehensive plan for closing sampling. Since this permit condition is already redundant with information included in Attachment HH, permit condition II.D.8 is unnecessary and should be deleted.

II.D.9. The regulation quoted in this permit condition, WAC 173-303-610(3)(c)(i) indirectly requires a time for notification; however, this period is, in fact, 45 days and not 4 weeks. The complete permit condition should be revised as follows:

"Within ~~four-(4)-weeks~~ 45 days of Notification of final closure pursuant to WAC 173-303-610(3)(c)(i) the Permittee shall submit to the Department a sampling plan. At a minimum the sampling plan shall identify the location of all soil samples to be taken and specify analytical methods proposed.

II.D.10. This permit condition contains verbiage which is vague and imprecise. Please revise the permit condition as shown below. In addition, please add language to define the nature of "specialized" sample collection or analysis techniques.

"The Permittee shall use approved analytical methods that achieve quantification limits ~~capable-of~~ adequate for demonstrating compliance with closure standards defined in permit condition II.D.6. To ensure this, the Department may require specialized sample collection or analysis techniques."

II.D.11.c. Please add the following language to this permit condition in order to allow flexibility and use of the most current laboratory methods:

"Metal analysis shall use SW-846 Method 3050, EPA method 200.2, or the most recent SW-846 digestion techniques for sample preparation for metals to be analyzed by AA or ICP."

II.F. FINANCIAL ASSURANCE AND LIABILITY REQUIREMENTS

NODs #361 and 364 of the October 3, 1991 NOD for Northwest EnviroService's RCRA Part B Permit Application state that documentation of financial assurance for closure of "expansion areas" (proposed units) is not required until 60 days prior to use of the areas for storage or treatment of dangerous wastes. This provision is applicable to proposed units, including tanks not yet in RCRA service, at the Pier 91 Facility as well. Please revise permit conditions II.F.1 and II.F.3 to be consistent with wording on this subject in the most recent Northwest EnviroService NOD.

II.F.3. Please delete the reference to Permit Condition II.D.8. since we have requested that this permit condition be deleted.

PART III - TANK MANAGEMENT PRACTICES

III.D. TANK MANAGEMENT PRACTICES

III.D.1. References in this permit condition to the term "waste" should be revised to read "dangerous waste". In addition, you have made a requirement with no regulatory mandate. Pursuant to WAC 173-303-395(1)(b) and WAC 173-303-640(10), the management of incompatible waste or material is only controlled by making sure those wastes are not combined so as to cause a reaction. The language should be modified as follows:

"The Permittee shall not place dangerous waste into a tank system that has not been decontaminated and that previously held an incompatible waste or material, unless the commingling of incompatibles is in such a manner so that it does not create a reaction or uncontrolled release."

III.D.4. The requirement to maintain integrity of the sealant is established by Permit Conditions D.III.3. and D.III.5. This permit condition infers that construction joints with waterstops installed internal to the joint are superior to construction joints without internal waterstops. This inference is not valid. Internal waterstops present several problems, including the following: (1) lack of integrity of the bond between concrete and waterstop; (2) stress cracking problems; and (3) leakage paths at the ends of internal waterstops. All of our construction joints will be sealed with state of the art waterstops such as banded waterstops; therefore, please delete this permit condition.

III.D.5. Tank system secondary containment, including sumps, will be constructed and maintained in accordance with WAC 173-303-640(4). These regulations do not restrict the material of construction, coating, or lining for secondary containment systems or sumps. The Pier 91 Facility Permit Application (Attachments II, EE, and JJ) currently identifies specific materials for sump coatings; therefore; we do not believe the information should be repeated in this permit condition. Please delete this permit condition.

PART IV FACILITY COMPLIANCE REQUIREMENTS

IV.A. TANK COMPLIANCE REQUIREMENTS

IV.A.1. We do not find any requirement in the regulations to support this permit condition. Modifications will be made according to the permit modification regulations cited in permit condition I.C.3. Compliance with the state regulations, including tank integrity assessments, is addressed in Section D of the Permit Application (Attachment II). Please delete this permit condition to avoid redundancy.

IV.3. General Comment: These conditions are redundant with information already included in the Pier 91 Permit Application, Section D (Attachment II). In addition, the regulations do not support these permit conditions. The following comments further describe the rationale for deleting these permit conditions.

IV.A.3.a. Using plans provided to Ecology for review, we have provided leak detection devices, in the form of drain pipes, on these tanks. These devices will indicate any serious integrity problems with the tanks. We feel that further leak detection systems are unnecessary and are not required by state or federal regulations; therefore, please delete this permit condition.

IV.A.3.b.i. and ii. These conditions are not in the regulations and are not consistent with similar inspection parameters allowed for double-walled tanks in the Georgetown or Washougal Facility Permits. Please delete these permit conditions. We suggest moving Permit Condition IV.A.3.b.iii. and placing it after the introductory sentence in Permit Condition IV.A.3.b.

IV.A.3.c. and d. There is no regulatory basis for these conditions. Again, similar requests have not been made for

double-walled tanks at other facilities. Please delete these permit conditions.

IV.B. CONSTRUCTION SCHEDULE

IV.B.1. Please revise this permit condition to list only the loading/unloading area. The remainder of the construction schedule is discretionary and will be completed if Chempro determines that use of the proposed tanks is desired. We suggest creation of another permit condition to discuss these items as follows:

"IV.B.2. If the Permittee chooses to construct the following items, the Department must be notified 120 days prior to initiation of their construction. Once construction activities begin, they shall be completed within the specified time delineated as follows:

Area A (See Figure IV-2)

5 months Remove tanks 106 and 108 and upgrade secondary containment to meet Permit requirements,

14 months Install tanks 2702 and 2704

Area B (See Figure IV-2)

5 months Upgrade secondary containment to meet Permit requirements

9 months Retrofit double bottoms on tanks 2701 and 2703 and place into RCRA service

Area C (See Figure IV-2)

6 months Upgrade secondary containment to meet Permit requirements

10 months Retrofit double bottom on tank 2709 and place into RCRA service

20 months Install tank 2307

24 months Install tank 2308

28 months Install tank 2309

32 months Install tank 2310

36 months Retrofit double bottom on tank 2710 and place into RCRA service

Proposed Facility

36 months Construct secondary containment to meet permit standards

IV.B.2. Please redesignate this permit condition as IV.B.3 pursuant to changes suggested above. Please also include the following language in the first sentence of this permit condition:

"The Permittee shall maintain records of all facility dangerous waste unit construction operations."

IV. B.3. Please redesignate this permit condition as IV.B.4. pursuant to changes suggested above.

IV.C. GENERAL FACILITY COMPLIANCE REQUIREMENTS

IV.C.2. Please revise this permit condition as follows:

"The applicant shall maintain within the Operating Record a map locating each dangerous waste management unit and locating each dangerous waste process, both ongoing and intermittent. The relocation of any dangerous waste processes shall be recorded within the operating record within 5 days of relocation."

IV.C.3. and IV.C.4. Please move these permit conditions to Section II.A. to be consistent with Georgetown and Washougal Facility Part B Permits (final and preliminary drafts, respectively).

IV.3.4. Please revise this permit condition to be consistent with the Washougal Preliminary Draft Part B Permit. The permit condition should specify "2 events per year and 12 samples per event".

IV.C.5. This condition is redundant with information in Attachment GG, Contingency Plan. Please delete this permit condition.

IV.C.6. and IV.C.7. These permit conditions are redundant with information already included the in Permit in Attachment HH. These permit conditions should be deleted.

IV.C.8. There are no applicable regulations which discuss inspection of groundwater monitoring wells. This is more reasonably addressed under the Corrective Action section of this permit. We feel the information included in Attachment EE is comprehensive and sufficient; therefore, please delete this permit condition.

IV.F.1. TRAFFIC MANAGEMENT

IV.F.1. The wording used in this permit condition is convoluted and confusing. Please simplify the permit condition as follows:

~~"Whenever a vehicle used for the transport of dangerous waste-to-or-from-the-facility-enters-the-facility-an employee-shall-always-be-in-such-a-position-that-he-or she-can-both-observe-the-approach-of-the-truck-towards the-loading/unloading-area-and-signal-to-the-driver-to turn-or-stop-enters the active portion of the facility,~~
a facility employee shall observe the approach or departure of the vehicle."

IV.F.2. Please revise this permit condition as follows:

"Vehicles used only for the transport of dangerous waste to or from the facility shall be parked in the designated loading/unloading area when on site."